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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THE CITY AND COUNTY OF SAN
FRANCISCO, CALIFORNIA and THE
PEOPLE OF THE STATE OF CALIFORNIA,
Acting by and through San Francisco City
Attorney DAVID CHIU,

Plaintiffs,

v.

PURDUE PHARMA L.P., et al.

Defendants.

Case No. 3:18-cv-7591-CRB

**DECLARATION SUMMARY OF
SWATI PATEL, PHARM.D.**

1 From 2010 to 2021, I served as the Outpatient Pharmacy Services Manager for
 2 Zuckerberg San Francisco General Hospital (“ZSFG”), and from 2021 to present, I have
 3 served as the Director of Pharmacy for ZSFG. ZSFG operates two types of public safety-
 4 net pharmacies: inpatient pharmacies for hospitalized patients and an outpatient
 5 pharmacy. In my deposition, Walgreens appeared to compare ZSFG’s pharmacies to
 6 Walgreens. The two organizations are fundamentally different.

7 ZSFG’s inpatient pharmacies provide medications to patients for direct
 8 administration under medical supervision.

9 ZSFG’s Outpatient Pharmacy is not open to the general public. It provides
 10 medications to two specific types of patients only: (1) patients discharged from a ZSFG
 11 hospital stay; and (2) low-income San Francisco residents who are established patients of
 12 the San Francisco Department of Public Health (“DPH”) network. Among other
 13 differences from Walgreens are the following:

- 14 • The pharmacy operates as a closed system:
 - 15 ○ With limited exceptions, it only fills prescriptions written by providers
 - 16 employed by DPH or affiliated with DPH (*e.g.*, UCSF physicians working at
 - 17 ZSFG).
 - 18 ○ Pharmacists have ready access to patients’ electronic medical records and are
 - 19 expected and trained to use those records to confirm diagnoses, identify drug
 - 20 interactions, ensure the appropriateness of the prescribed dose, and address any
 - 21 potential warning signs of diversion prior to dispensing.
- 22 • The majority of opioid prescriptions dispensed are for only a few days’ supply
- 23 following discharge from a hospital stay.
- 24 • Our pharmacists are not compensated or promoted based on the number of
- 25 prescriptions filled, turnaround time metrics, or the pharmacy’s revenue.
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